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RYAN WILSON

7

8   IN THE UNITED STATES DISTRICT COURT

9   FOR THE EASTERN DISTRICT OF CALIFORNIA

10

11	UNITED STATES OF AMERICA,	Case No. 1:21-cr-00315-DAD-BAM
12	Plaintiff,	**STIPULATION TO CONTINUE STATUS CONFERENCE; AND ORDER**
13	vs.	
14	RYAN WILSON,	Date: December 14, 2022
15	Defendant.	Time: 1:00 p.m. Judge: Hon. Barbara A. McAuliffe
16		

17   IT IS HEREBY STIPULATED by and between the parties through their respective

18 counsel, Assistant United States Attorney Kimberly Sanchez, counsel for plaintiff, and Assistant

19 Federal Defender Reed Grantham, counsel for Ryan Wilson, that the status conference currently

20 scheduled for October 12, 2022, at 1:00 p.m. may be continued to December 14, 2022, at 1:00

21 p.m.

22   On May 13, 2020, this Court issued General Order 618, which extended the previous

23 restrictions on courthouse access and in-court hearings until further notice from the Court. This

24 General Order was entered to address public health concerns related to COVID-19. By this

25 stipulation, the parties now move to continue the current status conference until December 14,

26 2022, and to exclude time between October 12, 2022, and December 14, 2022, under 18 U.S.C.

27 §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv).

28   The parties agree and stipulate, and request that the Court find the following. The

1   government has provided discovery in this matter. The defense remains in the process of

2   reviewing the discovery, conducting further investigation, and discussing the matter with his

3   client. The requested continuance will conserve time and resources for the parties and the Court.

4   Counsel for defendant believes that failure to grant the above-requested continuance would deny

5   him the reasonable time necessary for effective preparation, taking into account the exercise of

6   due diligence. The government does not object to the continuance.

7   Based on the above-stated findings, the ends of justice served by continuing the case as

8   requested outweigh the interest of the public and the defendant in a trial within the original date

9   prescribed by the Speedy Trial Act. For the purpose of computing time under the Speedy Trial

10   Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of October 12,

11   2022, to December 14, 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. §§

12   3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv) because it results from a continuance granted by

13   the Court at defendant's request on the basis of the Court's finding that the ends of justice served

14   by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

15

16   Respectfully submitted,

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                                            PHILLIP A. TALBERT
18   United States Attorney

19   Date: October 6, 2022   /s/ Kimberly Sanchez
                                            KIMBERLY SANCHEZ
20   Assistant United States Attorney
                                            Attorney for Plaintiff
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22   HEATHER E. WILLIAMS
                                            Federal Defender
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24   Date: October 6, 2022   /s/ Reed Grantham
                                            REED GRANTHAM
25   Assistant Federal Defender
                                            Attorney for Defendant
26   RYAN WILSON

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Wilson – Stipulation to Continue   2
Status Conference

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O R D E R

2   **IT IS SO ORDERED.** The status conference currently scheduled for October 12, 2022,

3   at 1:00 p.m. is hereby continued to **December 14, 2022, at 1:00 p.m. before Magistrate Judge**

4   **Barbara A. McAuliffe**. The time period to December 14, 2022, inclusive, is deemed excludable

5   pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv) because it results from

6   a continuance granted by the Court at defendant's request on the basis of the Court's finding that

7   the ends of justice served by taking such action outweigh the best interest of the public and the

8   defendant in a speedy trial.

9   IT IS SO ORDERED.

10   Dated: **October 6, 2022**   /s/ *Barbara A. McAuliffe*   _

11   UNITED STATES MAGISTRATE JUDGE

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Wilson – Stipulation to Continue   3
Status Conference